

# **Exhibit 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

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No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**DECLARATION OF ORRAN L. BROWN, SR.**

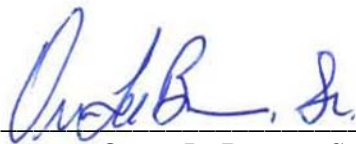
I, ORRAN L. BROWN, SR., hereby declare and state as follows:

1. My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC, located at 250 Rocketts Way, Richmond, Virginia 23231. BrownGreer PLC is the Claims Administrator under the Class Action Settlement Agreement in this action.
2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.
3. I submit this Declaration to describe an Opt Out revocation request we recently received.
4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to make public a list of Opt Outs as of that date. We posted on the official Settlement website a list of the Opt Outs that were timely and included all the elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (175 names at the time) and a list of the Opt Outs that were untimely and/or were missing one or more of Section 14.2(a)'s required elements (33 names at the time).
5. Section 14.2(c) of the Settlement Agreement provides that a Class Member who had Opted Out but wished to revoke that Opt Out could submit a written request to do so "[p]rior to the Final Approval Date." At various times after the April 22, 2015 Final Approval Date, 34 people who had Opted Out submitted requests to revoke their Opt Outs. The Parties to the Settlement

Agreement agreed to accept those revocation requests, subject to Court approval, and reported the requests to the Court. The Court has approved 33 of the 34 requests by Orders of July 15, 2015 (Document 6642), December 22, 2015 (Document 6713), January 26, 2016 (Document 6739), September 15, 2016 (Document 6907), October 25, 2016 (Document 6924), November 8, 2016 (Document 6937), December 21, 2016 (Document 7033), January 18, 2017 (Document 7084), January 20, 2017 (Document 7097), February 6, 2017 (Document 7119), March 9, 2017 (Document 7264), March 20, 2017 (Document 7297), March 28, 2017 (Document 7374), April 11, 2017 (Document 7471), April 13, 2017 (Document 7478), April 24, 2017 (Document 7547), May 2, 2017 (Document 7594), and May 18, 2017 (Document 7674). A revocation request by Mr. Andre Reed (Document 7707) is pending before the Court. Each time the Court approved a revocation, we no longer counted that person as an Opt Out and posted on the Settlement website a revised list of Timely Opt Out Requests Containing All Information Required by Section 14.2(a) or Otherwise Approved by the Court (the "Timely Opt Out List") to reflect the results of the Orders. That Timely Opt Out List now contains 148 names, including six persons whose Opt Outs the Court directed be added to the list in its Orders of September 8, 2016 (Document 6902) and March 6, 2017 (Document 7244).

6. On May 18, 2017, we received an Opt Out revocation request from Mr. Curtis Shane Nelson. Mr. Nelson, who is not represented by a lawyer, is on the Timely Opt Out List. I have attached to this Declaration a copy of his request, with his personal information redacted. The Parties to the Settlement Agreement have agreed to accept his revocation, subject to Court approval. If the Court grants its approval, we no longer will count Mr. Nelson as an Opt Out and, upon the Court's direction, we will post a revised Timely Opt Out List on the Settlement website.

I, Orran L. Brown, Sr., declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 22<sup>nd</sup> day of May, 2017.



Orran L. Brown, Sr.

***Curtis Shane Nelson***

[ Address ]

[ Phone Number ]

May 14, 2017

NFL Concussion Settlement  
Claims Administrator  
P.O. Box 25369  
Richmond, VA 23260

**RE: Opt Out Revocation Request**

Dear Claims Administrator:

I initially opted out of the concussion settlement but would now like to request revocation of that opt out. Please let me know what steps are necessary. I would like to fully participate in the concussion settlement if possible.

Thank you very much for your consideration and assistance.

Sincerely, 

Curtis Shane Nelson  
[ Email Address ]

Buffalo Bills 1977-1982  
San Diego Chargers 1985